

REMARKS/ARGUMENTS

Applicant respectfully requests reconsideration and allowance of the subject application.

Claims 1-9, 11-19, 21-26, 28-43 and 42-52 stand rejected.

Claims 1-9, 11-19, 21-26, 28-43 and 42-52 remain in this application.

35 U.S.C. §103

Claims 1-4, 6-9, 11-19, 21-26, 28-32, 42-43, 45-52 are rejected under 35 USC §103(a) as being unpatentable over U.S. Patent 6,694,485 B1 to Kelly et al (Kelly) in view of U.S. Patent 5,634,064 to Warnock et al (Warnock). Applicants respectfully traverse the rejection.

Kelly teaches viewing hypertext markup language (html) files. A method is taught where a computer and display screen are provided. The display screen has an adjustable number of screen rows for displaying lines of text on the display screen. An html file containing lines of text is accessed. The total number of lines of text in the html file is determined. A portion of the total number of lines of text in the html file is viewed such that the portion has lines of text assigned to screen rows of the display screen such that only entire lines of text are displayed on the display screen. (See Kelly, col. 2 lines 17-27).

Kelly further teaches creating and using a reserve table. In particular, the reserve table may be created after the html file is accessed. The reserve table contains the number of screen rows and the total number of lines of text in the html file. Lines of text in the html file are assigned to the screen rows. The number of lines of text in the html file is written to correspond to the screen rows.

1 After viewing the portion, the reserve table may be read to determine which of the
2 lines of text in the html file corresponding to the screen rows are to be viewed on
3 the display screen and writing the lines of text determined from the reserve table to
4 the screen rows for viewing. (See Kelly, col. 2 lines 28-38).

5 The html file has a fixed number of text lines. "Absolute row numbers"
6 represent the text line numbers of each row of the html file. The absolute row
7 numbers start at number 1 and proceed in sequence to the end of the html file.
8 (Kelly col. 6, lines 32-37). As an example, when an html file contains 38 lines of
9 text, the reserve table would contain 38 absolute row numbers representing each
10 line of the html file. Thus, absolute row numbers 1 to 38 are written onto the
11 reserve table, where absolute row numbers correspond to screen row numbers.
12 (See Kelly col. 7, lines 13-17 and Fig. 6).

13 **Independent claim 1** recites in part "paginating one or more pages of the
14 fixed digital document into multiple virtual pages".

15 The Action presents that this element is taught in Kelly Fig. 5, element 102,
16 and col. 7, lines 13-23. Element 102 of Fig. 5 of Kelly teaches that screen rows
17 are computed according to font type and size of the text. (See Kelly col. 7, lines 8-
18 10). The Action's cited section of Kelly teaches the reserve table that contains
19 corresponding absolute row numbers and lines (text) of an html file. The Office
20 disagrees with Applicant's earlier argument that Kelly fails to teach this element
21 of claim 1. The Action argues that "rows of text or data displayed on a computer
22 screen represent 'virtual pages', as defined by Applicant in the specification of the
23 Instant Application (See Applicant's Specification, Page 7, lines 8-9)". The cited
24 section of Applicant's specification refers to a virtual page 140 that includes
25 multiple rows of text. The Action presents that the rows of text represent virtual

1 pages; however, rows of text represent content or what may be included in a
2 virtual page. Furthermore, this element of claim 1 recites "paginating one or more
3 pages of the fixed digital document ..." which Kelly does not teach, and the
4 Action does not particularly point out in Kelly where "paginating" is taught.

5 Claim 1 further recites "identifying and locating lines of text within the one
6 or more pages of the fixed document".

7 The Action presents that this element is taught in Kelly Fig. 6, and col. 7,
8 lines 13-23. Fig. 6 of Kelly is the reserve table that relates absolute row numbers
9 to screen row numbers. The cited section of Kelly teaches the reserve table. The
10 Action associates an "html file" with "the fixed document" recited by claim 1. In
11 response to Applicant's prior argument, the Action argues that "[a]s is well known
12 in the art, Hypertext markup language is used for documents on the Web (See
13 Microsoft Computer Dictionary, Page 238, definition of HTML). Therefore, the
14 HTML file of Kelley teaches the limitation of pages of a document". Although an
15 html file ("fixed document" as argued by the Action) may be used for documents
16 of the Web, there is no teaching in Kelly that the html file actually has distinct
17 pages (one or more pages). Therefore, Kelly does not teach the element of
18 "identifying and locating lines of text within the one or more pages of the fixed
19 document".

20 The Action admits that "Kelley does not disclose expressly that the digital
21 document is a fixed digital document" and looks to Warnock as teaching
22 "obtaining a fixed (or predetermined format) digital document (See Warnock,
23 Figure 3b)". As discussed above, the Action argues that the html file taught in
24 Kelly is a digital document. The Action relies on Warnock as teaching a fixed
25 digital document. Therefore, the digital document in Warnock would have to

1 include the html file taught in Kelly; however, there is no teaching in Warnock
2 that the digital document can include html files. Therefore, it would not have been
3 obvious to combine the teachings of Kelly and Warnock. Accordingly, a
4 combination of Kelly and Warnock fails to teach or suggest every element of
5 claim 1, and the rejection of claim 1 is therefore improper. Applicant respectfully
6 requests that the §103 rejection of claim 1 be withdrawn.

7 **Dependent claims 2-4 and 6-8** depend from and comprise all the elements
8 of claim 1. As such, dependent claims 2-4 and 6-8 are allowable at the least by
9 virtue of their dependency on base claim 1. Applicant respectfully requests that
10 the §103 rejection of claims 2-4 and 6-8 be withdrawn.

11 **Independent claim 9** is rejected based on similar reasons as claim 1.
12 Applicant asserts the arguments presented in support of claim 1, in support of
13 claim 9. Applicant respectfully requests that the §103 rejection of claim 9 be
14 withdrawn.

15 **Dependent claims 11-18** depend from and comprise all the elements of
16 claim 9. As such, dependent claims 11-18 are allowable at the least by virtue of
17 their dependency on base claim 9. Applicant respectfully requests that the §103
18 rejection of claims 11-18 be withdrawn.

19 **Independent claim 19** is rejected based on similar reasons as claims 1 and
20 2. Applicant asserts the arguments presented in support of claim 1 (claim 2
21 depending on claim 1), in support of claim 19. Applicant respectfully requests
22 that the §103 rejection of claim 19 be withdrawn.

23 **Dependent claims 21-25** depend from and comprise all the elements of
24 claim 19. As such, dependent claims 21-25 are allowable at the least by virtue of
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1 their dependency on base claim 19. Applicant respectfully requests that the §103
2 rejection of claims 21-25 be withdrawn.

3 **Independent claim 26** recites in part “paginating one or more pages of a
4 digital document into multiple virtual pages”. As discussed above in support of
5 claim 1, Kelly fails to teach or suggest this element.

6 Warnock is cited for teaching “lowlighting or using half-tone to visually
7 identify context within a document” as recited in claim 26. However, as discussed
8 above, Warnock fails to teach or suggest that a document includes an “html file”
9 as taught in Kelly. Therefore, it would not have been obvious to combine the
10 teachings of Kelly and Warnock. Accordingly, a combination of Kelly and
11 Warnock fails to teach or suggest every element of claim 26, and the rejection of
12 claim 42 is therefore improper. Applicant respectfully requests that the §103
13 rejection of claim 26 be withdrawn.

14 **Dependent claims 29-32** depend from and comprise all the elements of
15 claim 26. As such, dependent claims 29-32 are allowable at the least by virtue of
16 their dependency on base claim 26. Applicant respectfully requests that the §103
17 rejection of claims 29-32 be withdrawn.

18 **Independent claim 42** recites in part “paginating, accordingly, one or more
19 pages of the digital document into multiple virtual pages”. As discussed above in
20 support of claim 1, Kelly fails to teach or suggest this element.

21 Claim 42 further recites “determining an integer number of virtual pages
22 per page of a digital document while maintaining legibility, aspect ratio, and good
23 margins, wherein the digital document is a fixed digital document”.

24 Warnock is cited for teaching a “fixed digital document”. However, as
25 discussed above, Warnock fails to teach or suggest that a document includes an

1 "html file" as taught in Kelly. Therefore it would not have been obvious to
2 combine the teachings of Kelly and Warnock. Accordingly, a combination of
3 Kelly and Warnock fails to teach or suggest every element of claim 42, and the
4 rejection of claim 42 is therefore improper. Applicant respectfully requests that
5 the §103 rejection of claim 42 be withdrawn.

6 **Dependent claims 43-46** depend from and comprise all the elements of
7 claim 42. As such, dependent claims 43-46 are allowable at the least by virtue of
8 their dependency on base claim 42. Applicant respectfully requests that the §103
9 rejection of claims 43-46 be withdrawn.

10 **Independent claim 47** is rejected based on similar reasons as claims 11,
11 12, 18 and 19. Applicants assert the arguments presented in support of claims 1, 9
12 (claim 18 depending on claim 9) and 19, in support of claim 47. Applicant
13 respectfully requests that the §103 rejection of claim 47 be withdrawn.

14 **Dependent claims 48-50** depend from and comprise all the elements of
15 claim 47. As such, dependent claims 48-50 are allowable at the least by virtue of
16 their dependency on base claim 47. Applicant respectfully requests that the §103
17 rejection of claims 48-50 be withdrawn.

18 **Independent claim 51** is rejected based on similar reasons as claim 17.
19 Applicant asserts the arguments presented in support of claims 1 and 9 (claim 17
20 depending on claim 9), in support of claim 51. Applicant respectfully requests
21 that the §103 rejection of claim 51 be withdrawn.

22 **Independent claim 52** is rejected based on similar reasons as claim 16.
23 Applicant asserts the arguments presented in support of claims 1 and 9 (claim 16
24 depending on claim 9), in support of claim 52. Applicant respectfully requests
25 that the §103 rejection of claim 52 be withdrawn.

1 Claim 5 is rejected under 35 USC §103(a) as being unpatentable over Kelly
2 in view of Warnock and U.S. Patent 6,188,779 to Baum (Baum). Applicant
3 respectfully traverses the rejection.

4 **Dependent claim 5** depends from and comprises all the elements of claim
5 1. As such, dependent claim 5 is allowable at the least by virtue of its dependency
6 on base claim 1.

7 Baum is cited for teaching “performing OCR on the content of a document
8 to determine boundaries”. Baum, however, provides no assistance in light of
9 Kelly and Warnock as to the recited methodology of claim 5. Accordingly, a
10 combination of Kelly, Warnock, and Baum fails to teach or suggest every element
11 of claim 5, and the rejection of claim 5 is therefore improper. Applicant
12 respectfully requests that the §103 rejection of claim 5 be withdrawn.

13 Claims 33-37 and 39-41 are rejected under 35 USC §103(a) as being
14 unpatentable over Kelly in view of Warnock and U.S. Patent 4,622,545 to
15 Atkinson (Atkinson). Applicant respectfully traverses the rejection.

16 **Independent claim 33** recites in part “paginating one or more pages of the
17 fixed digital document into multiple virtual pages”. As discussed above in support
18 of claim 1, Kelly fails to teach or suggest this element.

19 Warnock is cited for teaching a “fixed digital document”. However, as
20 discussed above, Warnock fails to teach or suggest that a document, fixed or
21 otherwise, includes an “html file” as taught in Kelly. Therefore it would not have
22 been obvious to combine the teachings of Kelly and Warnock.

23 Atkinson is cited for teaching “overlap that is differentiated from other
24 content”; however, Atkinson provides no assistance in light of Kelly and Warnock
25 as to the recited methodology of claim 33. Accordingly, a combination of Kelly,

1 Warnock, and Atkinson fails to teach or suggest every element of claim 33, and
2 the rejection of claim 33 is therefore improper. Applicant respectfully requests
3 that the §103 rejection of claim 33 be withdrawn.

4 **Dependent claims 34-37 and 39-41** depend from and comprise all the
5 elements of claim 33. As such, dependent claims 34-37 and 39-41 are allowable at
6 the least by virtue of their dependency on base claim 33. Applicant respectfully
7 requests that the §103 rejection of claims 34-37 and 39-41 be withdrawn.

8 Claim 38 is rejected under 35 USC §103(a) as being unpatentable over
9 Kelly, Warnock, Atkinson, and further in view of U.S. Patent 5,909,217 to
10 Bereiter (Bereiter). Applicant respectfully traverses the rejection.

11 **Dependent claim 38** depends from and comprises all the elements of claim
12 33. As such, dependent claim 38 is allowable at the least by virtue of its
13 dependency on base claim 33.


14 Bereiter is cited for teaching a "graying out portions of overlap". Bereiter,
15 however, provides no assistance in light of Kelly, Warnock, and Atkinson as to the
16 recited methodology of claim 33. Accordingly, a combination of Kelly, Warnock,
17 Atkinson and Bereiter fails to teach or suggest every element of claim 38, and the
18 rejection of claim 38 is therefore improper. Applicant respectfully requests that
19 the §103 rejection of claim 38 be withdrawn.
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Conclusion

Claims 1-9, 11-19, 21-26, 28-43 and 42-52 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. Should any matter in this case remain unresolved, the undersigned attorney respectfully requests a telephone conference with the Examiner to resolve any such outstanding matter.

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Respectfully Submitted,


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